

1 IN THE UNITED STATES DISTRICT COURT FOR THE  
 2 NORTHERN DISTRICT OF OKLAHOMA  
 3  
 4

5 W. A. DREW EDMONDSON, in his )  
 6 capacity as ATTORNEY GENERAL )  
 7 OF THE STATE OF OKLAHOMA and )  
 8 OKLAHOMA SECRETARY OF THE )  
 9 ENVIRONMENT C. MILES TOLBERT, )  
 10 in his capacity as the )  
 11 TRUSTEE FOR NATURAL RESOURCES )  
 12 FOR THE STATE OF OKLAHOMA, )

13 Plaintiff, )

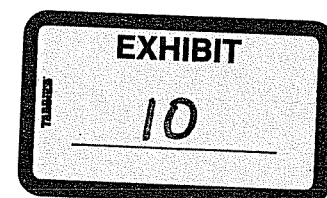
14 vs. ) 4:05-CV-00329-TCK-SAJ

15 TYSON FOODS, INC., et al, )

16 Defendants. )

17 - - - - -  
 18 THE VIDEOTAPED 30(b)(6)  
 19 DEPOSITION OF READ HUDSON, produced as a witness  
 20 on behalf of the Plaintiff in the above styled and  
 21 numbered cause, taken on the 20th day of August,  
 22 2007, in the City of Fayetteville, County of  
 23 Washington, State of Arkansas, before me, Lisa A.  
 24 Steinmeyer, a Certified Shorthand Reporter, duly  
 25 certified under and by virtue of the laws of the  
 State of Oklahoma.

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 918-587-2878



1 MR. SANDERS: Bob Sanders for the Cal-Maine  
2 defendants.

3 MR. ELROD: John Elrod for defendant  
4 Simmons.

5 VIDEOGRAPHER: Thank you. The witness may 09:05AM  
6 be sworn in.

7 READ HUDSON  
8 having first been duly sworn to testify the truth,  
9 the whole truth and nothing but the truth, testified  
10 as follows:

11 DIRECT EXAMINATION

12 BY MR. GARREN:

13 Q Would you please state your name to the court  
14 and for the Record?

15 A Read Hudson. 09:05AM

16 Q Mr. Hudson, are you currently employed?

17 A Yes.

18 Q For whom are you employed?

19 A Tyson Foods.

20 Q And that formal name is Tyson Foods, Inc.; is 09:05AM  
21 that correct?

22 A Yes, sir.

23 Q What position do you hold there?

24 A Vice-president, associate general counsel and  
25 corporate secretary. 09:05AM

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1 A Correct. Wait, wait, wait. Ask your question  
2 again.

3 Q Okay. Who owns the egg that's produced for  
4 purposes of creating either broilers or hens or  
5 pullets? 10:34AM

6 A Either Farms, Poultry or Chicken.

7 Q Okay, all right.

8 A Not Foods.

9 Q I see your distinction. Okay. And Cobb, does  
10 it own eggs? 10:34AM

11 A The eggs that it uses to produce in the  
12 breeding stock production, yes.

13 Q Okay, and so -- and Tyson Food, Poultry and  
14 Chicken -- I'm sorry, Tyson Chicken and Poultry also  
15 own complexes where processing, hatchery occurs,  
16 feed mills; is that correct? 10:34AM

17 A Yes.

18 Q All right, and so Tyson Foods, Inc., does it  
19 consider itself to be an integrated, vertically  
20 integrated company because it has companies it owns  
21 from the egg all the way up until the processed meat  
22 goes to the retail side for sale?

23 A Yes.

24 Q Does --

25 A On the chicken side. 10:35AM

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1 Q On the chicken side, and I'm dealing --

2 A When -- before you just said integrated.

3 Vertically integrated, yes.

4 Q All right. Who performs the accounting  
5 services for Tyson Poultry for its businesses; does  
6 it have its own in-house accounting?

10:35AM

7 A Yes, it does.

8 Q Does Tyson Chicken, likewise, have its own  
9 in-house accounting?

10 A Yes, sir.

10:35AM

11 Q And does Cobb-Vantress have its own in-house  
12 accounting?

13 A Yes.

14 Q Is that consolidated at some point and  
15 reported under Tyson Food, Inc.?

10:36AM

16 A Once they get to the financial statements that  
17 are externally reported, you know, in our Securities  
18 and Exchange Act filings, yes, they are  
19 consolidated.

20 Q Where does that consolidation occur; in Tyson  
21 Foods, Inc.?

10:36AM

22 MR. GEORGE: Under what entity are they  
23 consolidated?

24 MR. GARREN: Yes, yes.

25 A Yes.

10:36AM

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